YI LIN ZHENG 1 Nevada State Bar No. 10811 Vegas Golden Law 2 500 Rose Street Las Vegas, Nevada 89102 3 (702) 385-7170/Phone vegasgoldenlaw@gmail.com 4 Attorney for Rene Ramirez 5 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 9 UNITED STATES OF AMERICA, Case No. 2:15-cr-00289-JCM-CWH 10 Plaintiff, STIPULATION TO CONTINUE REVOCATION HEARING 11 v. (Fourth Request) 12 RENE RAMIREZ, 13 Defendant. 14 15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, 16 United States Attorney, and Joshua Brister, Assistant United States Attorney, counsel for the 17 United States of America, and Yi Lin Zheng, counsel for Rene Ramirez, that the revocation 18 hearing currently scheduled for June 24, 2024 be vacated and set to a date and time convenient 19 to this Court, but no sooner than seven 7) days. 20 The Stipulation is entered into for the following reasons: 21 Mr. Ramirez is scheduled for sentencing on July 8, 2024 in his federal SORNA 1. 22 case, 21-cr-215-JAD-NJK. 23 2. The parties are prepared to go forward and anticipate Mr. Ramirez will be 24 sentenced that day. 25 3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's 26

sentencing strategy in this case.

1	4.	The parties agree to the continua	ance.
2	5. Mr. Ramirez is in custody and does not object to a continuance.		
3	6. The additional time requested herein is not sought for purposes of delay, but		
4	merely to allow counsel for defendant sufficient time within which to be able to effectively and		
5	complete investigation of the discovery materials provided. Additionally, denial of this request		
6	for continuance could result in a miscarriage of justice.		
7	This is the fourth stipulation to continue filed herein.		
8	DATED: June 17, 2024.		
9	By <u>/s/ Yi Li</u>	in Theno	JASON M. FRIERSON
10	YI LIN ZHENG	United States Attorney	
11	Counsel for Rene Ramirez		By <u>/s/Joshua Brister</u> JOSHUA BRISTER
12			Assistant United States Attorney
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:15-cr-00289-JCM-CWH

Plaintiff,

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

v.

RENE RAMIREZ,

Defendant.

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 1. Mr. Ramirez is scheduled for sentencing on July 8, 2024 in his federal SORNA case, 21-cr-215-JAD-NJK.
- 2. The parties are prepared to go forward and anticipate Mr. Ramirez will be sentenced that day.
- 3. Mr. Ramirez's sentence in the SORNA case will affect defense counsel's sentencing strategy in this case.
 - 4. The parties agree to the continuance.
 - 5. Mr. Ramirez is in custody and does not object to a continuance.
- 6. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

ORDER

IT IS FURTHER ORDERED that the revocation hearing is continued to **July 12**, **2024**, at 10:30 a.m.

DATED June 21, 2024.

UNITED STATES DISTRICT JUDGE